BEFORE THE POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

DOCKET NO. R97-1

POSTAL RATE AND FEE CHANGES, 1997

THIRD SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS CRUM (UPS/USPS-T28-17-18)

(August 15, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Crum (UPS/USPS-T28-17 through 18).

Respectfully submitted,

John E. McKeever Albert P. Parker, II Stephanie Richman

Attorneys for United Parcel Service

SCHNADER HARRISON SEGAL & LEWIS LLP 1600 Market Street, Suite 3600 Philadelphia, Pennsylvania 19103-7286 (215) 751-2200 and 1913 Eye Street, N.W., Suite 600 Washington, D.C. 20006-2106

(202) 463-2900

Of Counsel.

THIRD SET OF INTERROGATORIES OF UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS CRUM

UPS/USPS-T28-17. Referring to the attached chart, please provide the average number of pieces per container of Parcel Post for each container used in calculating the Postal Service's acceptance and mail processing costs and savings in Docket No. R97-1.

(SEE ATTACHED CHART)

UPS/USPS-T28-18. Referring to the attached chart, please provide the average number of pieces per container of Parcel Post for each container used by the Postal Service.

(SEE ATTACHED CHART)

Average Number of Pieces of Parcel Post

	Downstream to SCFs and Delivery Units		DSCF Drop Ship	DDU Drop Ship	Mailer OBMC Entry
<u>Containers</u>	<u>Machinable</u>	Non- <u>Machinable</u>	Non- <u>Machinable Machinable</u>	Non- <u>Machinable Machinable</u>	Non- <u>Machinable Machinable</u>
(a) Sack					
(b) Pallet					
(c) OTR					
(d) "Gaylords"					
(e) GPMC					
(f) IHC					
(g) OWC					

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

Dated: August 15, 1997 Philadelphia, PA